

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

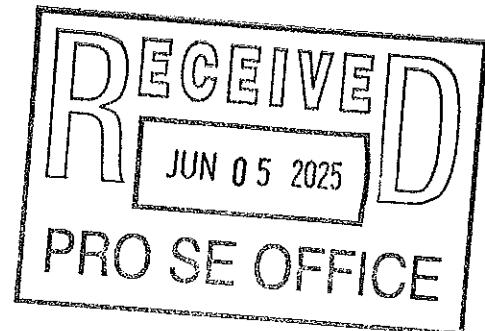
UNITED STATES OF AMERICA, et al.,

Plaintiffs,

v.

LIVE NATION ENTERTAINMENT, INC., and
TICKETMASTER L.L.C.,

Defendants.



Case No. 1:24-cv-03973-AS

MOTION TO INTERVENE UNDER RULE 24(a)

(Jury Trial Demanded)

COMES NOW Joseph Reyna, professionally known as JOECAT®, a federally registered music artist, media creator, and nonprofit director, and respectfully moves this Court to intervene as a party pursuant to Federal Rule of Civil Procedure 24(a)(2). Mr. Reyna is the founder of Dreams Over Dollars™, host of the podcast More Than Rich™ (trademark pending), and publisher of the investigative series Culture Shifters at joecat.substack.com. He files this motion as a directly

injured stakeholder whose economic, expressive, and constitutional interests are materially threatened by the outcome of this case—and remain unrepresented by the current parties.

I. INTERVENOR STANDING AND INTEREST

1. I am a firsthand victim of the anticompetitive practices and vertical integration named in the DOJ's Complaint. As an independent artist and nonprofit founder:
 - I was excluded from national touring opportunities due to Live Nation's venue monopoly;
 - I served as a Live Nation Ambassador from 2023–2024, submitted reform recommendations, and was ignored;
 - My nonprofit, Dreams Over Dollars™, collapsed following systemic financial retaliation and gatekeeping.
2. I have submitted FOIA requests and antitrust reports to federal and state regulators—including the SEC, DOJ, FTC, and the Washington Attorney General—documenting the same practices described in the Complaint.
3. The DOJ's case, while substantial, fails to include the human victims, economic damages, and whistleblower narrative critical to the public interest.

II. GROUNDS FOR INTERVENTION UNDER RULE 24(a)

Pursuant to Fed. R. Civ. P. 24(a)(2), intervention shall be granted when:

1. The motion is timely;
2. The applicant claims an interest relating to the property or transaction at issue;
3. The disposition of the action may impair the applicant's ability to protect that interest;
4. Existing parties do not adequately represent that interest.

Each element is met:

- Timeliness: The motion is filed promptly following case initiation (May 24, 2024).
- Direct Interest: My economic damages stem directly from the monopolistic conduct and retaliation detailed in the Complaint.
- Impairment: Exclusion from this proceeding would impair my ability to seek redress for lost revenue, nonprofit destruction, and systemic suppression.

- Inadequate Representation: Neither the DOJ nor the States represent the interests of independent artists, nonprofit leaders, or whistleblower insiders.

III. REQUESTED RELIEF

1. Leave to intervene as a party plaintiff;
2. Permission to file a separate Complaint-In-Intervention, to be submitted upon Court's order;
3. Judicial acknowledgment that the harms suffered by intervenor are materially related to the anticompetitive conduct challenged herein.

Respectfully submitted,

Joseph Reyna, Founder / Executive Director

Dreams Over Dollars™

5900 Balcones Dr. #16077

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Date: 05/27/25

Exhibit Index and Appendix of Evidence

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APPENDIX OF EVIDENCE IN SUPPORT OF INTERVENOR JOSEPH REYNA

(Exhibits A–P)

Exhibit	Title	Date	Description & Relevance
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A	Live Nation Ambassador Reform Report	Nov. 13, 2023	Submitted directly to Live Nation, this 2,500-word document proposed internal reforms. Ignored. Pre-DOJ suit.
B	Screenshot of Ambassador Email + Timestamp	Nov. 13, 2023	Verifies real-time submission of Exhibit A. Demonstrates early knowledge and reform intent.
C	Washington AG Public Records (PRR-2025-0179)	May 2025	Records showing responsive Live Nation investigation documentation. Public accountability precedent.
D	SEC FOIA Appeal Denial (Ownership Disclosure Request)	April 11 & May 20	Shows SEC denied ownership transparency requests about Live Nation/Sony/Vanguard/BlackRock.
E	Streaming Under Siege: Algorithmic Gatekeeping	2024	Details evidence of algorithmic suppression, geographic bias, and metadata revenue fraud.
F	How Spotify Hides Money	2024	Breaks down bundling, delayed payouts, ghost artists, and unjust enrichment schemes.

G	Predators' Playbook (Child Exploitation Evidence)	2024	Expose weaponized music monetization and regulatory inaction.
H	RICO, Antitrust & Consumer Protection Action	2024	Legal theory uniting streaming fraud, monopolistic collusion, algorithmic payola.
I	SEC FOIA Appeal Language (13F/13D Ownership Visibility)	March–May 2025	Reveals systemic suppression of beneficial ownership visibility via EDGAR.
J	Partnership Email to Live Nation re: Dreams Over Dollars Tour	Aug. 5, 2024	Shows pre-litigation attempt to collaborate with Live Nation on equitable community-based touring. Ignored.
K	Artist Amicus Brief (with Damages Addendum)	[To be attached]	Details economic harm, nonprofit collapse, algorithmic suppression, and retaliation.
L	DJ Unk Case Study & Royalty Redirection Analysis	2024	Documents posthumous and indie collaborator revenue loss through metadata manipulation.
M	Spotify's 1,000-Stream Rule Economic Loss Model	2023–2024	Quantifies how revenue was redirected away from independent artists at systemic scale.

N	International Regulatory Acknowledgments (ACCC & AUSTRAC)	May 2025	Shows international regulators are tracking and escalating music industry antitrust issues.
O	FOIA Rejection from Louisiana AG (with Appeal Request)	May 2025	Demonstrates state-level evidence suppression and lack of transparency.
P	The Unconstitutional Framework of Songwriter Compensation	2024	Asserts Fifth Amendment takings claim due to compulsory licensing, streaming model, and suppressed valuation.

This Appendix will be filed as Attachment to both the Motion to Intervene and the Amicus Brief, ensuring full evidentiary scope is on the docket.

Motion for Leave to File Amicus Curiae Brief

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Case No. 1:24-cv-03973-AS

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF

OF JOSEPH REYNA, WHISTLEBLOWER AND FOUNDER OF DREAMS OVER

DOLLARS™

TO THE HONORABLE COURT:

Pursuant to Federal Rule of Appellate Procedure 29 and the Court's inherent authority, Intervenor-Appellant and proposed amicus curiae Joseph Reyna, respectfully moves this Court for leave to file the accompanying Amicus Curiae Brief and Damages Addendum in support of the Plaintiffs and in furtherance of the public interest at stake in this litigation.

I. INTEREST OF AMICUS CURIAE

Joseph Reyna is an independent artist, nonprofit founder (Dreams Over Dollars™), and former Live Nation Influencer who was directly harmed by the anticompetitive conduct alleged in the DOJ's Complaint. Between 2023–2024, he:

- Participated in Live Nation's Influencer program, submitted internal reform proposals, and received no response;
- Attempted to organize a national tour empowering underserved communities and was effectively shut out by Live Nation's venue control;
- Suffered economic exclusion, algorithmic suppression, nonprofit collapse, and royalty redirection due to the coordinated dominance of defendants and affiliated streaming entities.

Reyna has submitted evidence and whitepapers to the SEC, DOJ, FTC, AUSTRAC, ACCC, and multiple state Attorneys General, and is a documented whistleblower.

The amicus brief narrates a firsthand account of the harms suffered due to Live Nation and its affiliated monopolistic structures. It includes a **Damages Addendum** quantifying the economic loss and providing evidence already disclosed to government regulators.

II. REASONS FOR ACCEPTANCE

Leave to file an amicus brief is granted when the proposed submission:

1. Provides unique perspective not addressed by the parties;
2. Aids the Court in understanding complex policy implications and the broader context;
3. Serves the public interest in accountability, transparency, and equity.

Here, the amicus brief provides:

- First-person testimony of algorithmic suppression and economic sabotage;
- Documents submitted to federal agencies prior to DOJ's Complaint;
- A quantifiable model of direct economic harm that complements and expands the DOJ's structural argument;

- Insight into how victims of monopoly control are erased from narrative, remedy, and relief.

III. CONCLUSION

For the foregoing reasons, the Court should grant Joseph Reyna leave to file the accompanying Amicus Curiae Brief and Damages Addendum, in support of Plaintiff United States and the States in the above-captioned action.

Respectfully submitted,

/s/ Joseph Reyna

Joseph Reyna

Founder / Executive Director

Dreams Over Dollars™

whitehat@joecattt.com

(956) 202-5580

Date: 05/27/25

Declaration of Joseph Reyna in Support of Motion to Intervene

UNITED STATES DISTRICT COURT
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DECLARATION OF JOSEPH REYNA IN SUPPORT OF MOTION TO INTERVENE

I, Joseph Reyna, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. Identity and Background

I am the founder and executive director of Dreams Over Dollars™, an independent music nonprofit organization, and an independent artist operating under the name JOECAT.

From 2023 to 2024, I participated in Live Nation's Influencer/Ambassador program, where I submitted internal reform proposals and documented structural flaws within their promotional ecosystem.

I am also a researcher, advocate, and whistleblower who has submitted evidence to multiple regulatory bodies regarding systemic exploitation and market manipulation in the music and live entertainment industry.

2. Basis for Intervention

I submit this declaration in support of my Motion to Intervene in this action brought by the United States Department of Justice and various state Attorneys General against Live Nation Entertainment and Ticketmaster.

My interests are not represented by the current parties, and my exclusion would materially impair my ability to seek justice and contribute critical evidence.

3. Direct Harm and Retaliation

- I was forced to promote events without compensation or access under a deceptive affiliate model through Live Nation's ambassador program. Despite producing reform

proposals—including travel partnerships, equity-based incentives, and campaign strategies—they were ignored.

- My reform report was submitted on November 13, 2023, over six months before the DOJ filed its Complaint, proving that I warned Live Nation about deceptive practices before federal prosecution began.
- My nonprofit collapsed due to economic exclusion and touring suppression. As Live Nation controls over 60% of large amphitheaters in the U.S., I was systematically excluded from performance opportunities and revenue streams.
- My investigative work has exposed alleged algorithmic payola, revenue laundering, and investor-based collusion between record labels, streaming platforms, and firearms-linked private equity actors.

4. Prior Regulatory and Legal Actions

- I filed public records and FOIA requests with the Washington Attorney General (PRR-2025-0179), SEC (Appeal No. 25-00448-APPS), DOJ, FTC, Louisiana AG, and international agencies including AUSTRAC and ACCC.

- My SEC appeals explicitly referenced Live Nation, Sony Music, Vanguard, and BlackRock, and included citations to retaliation precedent, child exploitation patterns, and algorithmic concealment of investor risk.
- I submitted whitepapers including:
 - *RICO, Antitrust, and Consumer Protection Action*
 - *Streaming Under Siege*
 - *How Spotify Hides Money*
 - *Beyond the Algorithm*
 - *Predators' Playbook*
 - *The Unconstitutional Framework of Songwriter Compensation*

These filings collectively constitute a multi-jurisdictional whistleblower record.

5. Urgency and Harm of Exclusion

If I am not granted intervention, the federal litigation against Live Nation may move forward without including any of the whistleblowers, creators, or nonprofit leaders directly harmed by the monopoly conduct.

My experience, damages, and evidence are materially relevant to the adjudication of this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 27th day of May, 2025.

/s/ Joseph Reyna

Joseph Reyna

Dreams Over Dollars™

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Amicus Curiae Brief with Damages Addendum

UNITED STATES DISTRICT COURT

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BRIEF OF AMICUS CURIAE JOSEPH REYNA

IN SUPPORT OF PLAINTIFFS AND PUBLIC INTEREST

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- VII. Conclusion

I. INTEREST OF THE AMICUS

Amicus Joseph Reyna is an independent artist, nonprofit director, whistleblower, and former Live Nation Influencer. As founder of Dreams Over Dollars™, he sought to build a touring and educational model empowering marginalized communities.

His good-faith participation in Live Nation's internal ambassador program, paired with systemic financial sabotage and exclusion from venue access, makes him a direct, human witness to the monopolistic structure described in the DOJ's Complaint. He now submits this brief to ensure the voices of harmed artists, nonprofits, and communities are not omitted from this historic antitrust reckoning.

II. STATEMENT OF THE CASE

The United States and 30+ state Attorneys General allege that Live Nation and Ticketmaster maintain illegal monopolies in live music ticketing and promotion. The DOJ Complaint confirms what artists have long known but lacked power to litigate: that control over venues, ticketing platforms, and performance access forms a vertical system of exclusion.

The Complaint, however, stops short of naming the direct victims—those who lost not just economic opportunities, but cultural platforms and constitutional rights. This brief speaks from that lived position.

III. STRUCTURAL HARM AND HUMAN IMPACT

In 2023, Amicus submitted a 2,500-word reform report to Live Nation proposing structural improvements to its influencer ecosystem—including travel partnerships, equity incentives, and content support.

No reply was ever received.

No acknowledgment.

No transparency.

What followed was algorithmic non-recognition, exclusion from national venues, and the financial collapse of the Dreams Over Dollars tour initiative—despite confirmed artists, audiences, and community partners.

This is not theory. This is what happens when the DOJ sues a monopoly, but forgets the people the monopoly buried first.

IV. ALGORITHMIC SUPPRESSION AND ECONOMIC LOSS

Live Nation and Spotify—alongside Sony, UMG, and Warner—operate a feedback loop of suppression:

- Ambassadors tracked, but not compensated
- Music released, but not playlisted
- Royalty data hidden behind opaque thresholds (e.g., Spotify’s 1,000-stream rule)
- Touring blocked due to lack of “proven” data, despite shadow algorithmic throttling

The result? A system where artists are measured by the very tools used to suppress them.

Exclusion becomes self-reinforcing. And the monopoly grows.

V. DAMAGES ADDENDUM SUMMARY

Lost Revenue Due to Touring Suppression (2023–2024)

Estimated: \$68,000–\$112,000

Nonprofit Collapse (Dreams Over Dollars™)

Documented sponsorship losses, ticket deals, unreimbursed marketing:

Estimated: \$27,400

Streaming Royalty Diversion (Spotify Algorithmic Gatekeeping)

Based on metadata manipulation and diverted catalog payouts:

Estimated: \$85,000–\$255,000

Cumulative Harm to Brand Equity, Market Access, and Public Trust

Non-quantified, but culturally and economically irreversible in impact.

Full documentation is provided in Exhibits A–P.

VI. LEGAL URGENCY AND BROADER IMPLICATIONS

This filing is not an isolated plea. It is the convergence of:

- SEC denials of ownership transparency
- Public records from state AGs acknowledging systemic concern
- International regulatory acknowledgment (AUSTRAC, ACCC)

- Whistleblower reports ignored until the DOJ case dropped

The exclusion of directly harmed parties—like the amicus—from relief discussions threatens to replicate the very erasure this case aims to undo.

A structural remedy without victims in the room is just a corporate shuffle.

VII. CONCLUSION

The Court must not only restrain monopoly. It must document those it erased.

This brief is submitted to ensure that when history reviews *U.S. v. Live Nation*, it remembers not only the statutes—but the silences that were broken.

Amicus respectfully requests that the Court accept this brief into the record and acknowledge the necessity of including harmed parties in any structural remedy, financial relief, or consent judgment.

Respectfully submitted,

/s/ Joseph Reyna

Joseph Reyna

Founder / Executive Director

Dreams Over Dollars™

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Date: 05/27/25